

As a member of the Passenger Vessel Association and an operator of two excursion vessels, K vessels, in St. Louis, I wish to commend the CoastGuard for their inclusion of the option of using an Alternative Security Program (section 101.120(b) of Title 33, Code of the Federal Regulations). The Passenger Vessel Association, PVA, will be submitting an Alternative Security Program to the Coast Guard for approval. We feel that the "PVA Industry Standards for Security for Passenger Vessels and Small Passenger Vessels" will provide the best standards for our operations and will comply with our legal obligations for security. The PVA's industry's standards will best address our diverse vessel types and operations offering the best security for our passengers and vessel operators.